

Response to Comment
Fawn Lodge Forest Fire Station Replacement Project
Trinity County, California
State Clearinghouse Number 2009092043

Prepared by:
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January 6, 2010

The California Department of Forestry and Fire Protection (CAL FIRE) is serving as Lead Agency for California Environmental Quality Act (CEQA) compliance for the above-listed proposed project. An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared, filed at the State Clearinghouse on September 14, 2009, and distributed or made available for a 30-day public and agency review period in conformance with CEQA Guidelines 14 CCR §15101(b) and §15072(b). The 30-day agency and public review period began on September 14, 2009 and ended on October 13, 2009. A total 12 comment letters containing 56 written comments were submitted to the Department. These included 2 letters containing 4 comments from 2 public agencies and 10 letters containing 52 comments from 5 members of the general public. All of these 56 comments were given full consideration by the Department. The acronym of the agency (for public agency comments) or the initials of the submitter's first and last name (for public comments) are used to identify each individual comment on the list of comments, and the Department's response to them, which follows.

The four written comments from public agencies came from:

- (NCRWQB) Mr. Dean Prat, Engineering Geologist, North Coast Regional Water Quality Control Board 5550 Skylane Boulevard, Suite A, Santa Rosa, CA 95403.
- (TCSO) Mr. Anton Jaegel, Supervisor District 3, Trinity County Supervisor's Office, P.O. Box 1613, 11 Court Street, Weaverville, CA 96093.

The fifty-two comments from members of the general public came from:

- (GB) Gay Berrien, Board Member, Trinity County Historical Society, P.O. Box 333, Weaverville, CA 96093
- (RP) Rod Plew, President, Trinity County Historical Society, P.O. Box 333, Weaverville, CA 96093
- (BM) Bob Maxey, 2586 Sacramento Drive, Redding, CA 96001
- (EH) Edward Holland, P.O. Box 1069, Eureka, CA 95502
- (JS) Joan Sharpe, President, CCC Legacy, Inc., P.O. Box 341, Edinburg, VA 22824

This document contains CAL FIRE's responses to all substantive comments received during the public review period. A complete copy of each comment letter submitted to the Department is also included. A copy of this document will be mailed to each individual comment submitter, is included as part of the Final CEQA Document, and has become part of the CEQA Administrative Record supporting this project.

Comments from Public Agencies (4)

Comment #1 (NCRWQCB): I have reviewed the subject environmental document that was sent directly to my attention. Thanks for the opportunity. The document looks good. My only question relates to potential discharges of wastewater from the new hose wash rack. I do not know if/what soaps or cleaners are used or what is involved with fire hose washing. I can imagine some dirty discharges. I did not find any description of this activity in the document. How is the wastewater handled and where will hose wash wastewater be discharged?

Response to Comment #1: There will be no direct discharge into either watercourse and the installation of a filter into the drainage system will be a significant improvement over existing conditions. Wastewater from use of the new hose wash rack, along with all other run-off collected within a curbed paved area, will be collected and passed through a sand/oil separator (filter) before it exits the facility at the west side of the compound. It will be

dispersed as it exits the facility into a vegetated swale area to percolate into the soil and vegetation. The size of the filter and vegetated swale will be engineered to accommodate the anticipated water flow. After returning from an incident, fire hose is typically rinsed on the wash rack with clean water, brushed, then rinsed again and allowed to dry. A mild soap is sometimes used but often the brushing is just done with clean water and no soap. The project description has been edited in the Final CEQA document to clarify these procedures. The location of the drainage swale is shown as Item #17 on a new Figure 5 of the Final CEQA document, which is enclosed.

Comment #2 (TCSO) Under the National Historic Preservation Act both of the CCC buildings must be preserved on site and in place.

Response to Comment #2 The National Historic Preservation Act (NHPA) is a federal statute which applies to federal (not state) agencies. The NHPA applies to undertakings which are implemented, funded, or permitted by a federal agency. This project is subject to the requirements of the California Environmental Quality Act which has very similar provisions regarding a public agency's responsibilities to include historical resource considerations within environmental impact studies. Neither the NHPA nor CEQA require an agency or landowner to preserve significant historic buildings on site and in place in all instances. Both Acts require public agencies to recognize that historical resources are part of the environment and those impacts to historic properties (the term used in the NHPA) or historical resources (the term used in CEQA) may constitute a significant effect on the environment. State or Federal agencies are required to consider these potential impacts and mitigate or re-design a project to avoid or lessen the significance of environmental impacts, if feasible, and accomplish this through an agency and public review process prior to project approval.

Comment #3 (TCSO) There is more than enough room on the properties to place the new structures in locations that do not displace the CCC buildings.

Response to Comment #3 The space issue, and a detailed discussion of problems with the old station design, are discussed in the December 4, 2009 memo and in Response to Comment #6.

Comment #4 (TCSO) The public notification requirements for the CEQA document were not in accordance with the law.

Response to Comment #4 Public notification requirements pertaining to review of Mitigated Negative Declarations are found in CEQA Guidelines 14 CCR §15072(b). The public notification efforts carried out by CAL FIRE for this proposed project are in full compliance with those requirements and included two separate efforts. One step occurred in 2001 during review of the Department's Management Plan for its Historic Buildings and the Environmental Impact Report which addressed impacts resulting from that Plan, which disclosed CAL FIRE's intent to demolish the two CCC buildings at Fawn Lodge when the station replacement project is funded. The other public notification effort occurred during the development and review of the draft CEQA document supporting the proposed project at Fawn Lodge. The details of these notification procedures are discussed in Response to Comment #21.

Comments from Members of the General Public (52)

Comment #5 (GB) The State of California is making a big mistake in pursuing this project that will require the removal of two 1935 Civilian Conservation Corps (CCC) structures from their historic settings. These buildings are more valuable and unique than what is related in your report. I am asking that you preserve these buildings in their historic setting.

Response to Comment #5 CAL FIRE initiated a feasibility analysis in response to the public request that it attempt to preserve one or both of the historic CCC camp buildings in their historic setting. The Department has revised the proposed project revised to keep, repair and preserve the historic office building on site. The results of the feasibility study, and the Department's decision, are documented in a Memo to the CEQA Administrative Record (dated December 4, 2009) – a copy of which is included in this response. The Final CEQA document has been revised to include this change in the project description. However, the historic kitchen/messhall will need to be demolished as originally proposed. There simply is not adequate space on site to keep them both and accomplish the needed upgrades to the facility. Transfer of ownership, relocation, or management as a standing ruin of the kitchen/messhall was not feasible at this project site.

Comment #6 (GB) In looking over the report, I am not convinced that the State really needs to change the compound. Certainly, maintenance and upgrades are evidently in order, but the alternative I would ask you to select—to abort the present chosen alternative and keep the building as they are—would be much cheaper for the State than altering the whole flat and constructing costly new buildings, especially in light of California's present fiscal situation.

Response to Comment #6 The alternative you suggest - to keep, maintain, and upgrade the existing buildings "as they are" would not resolve the operational problems discussed in the CEQA document. The following information describing the current condition of the buildings and the need to replace the facility (from page 7 of the CEQA document) is presented below:

All of the buildings and structures are exhibiting symptoms of infrastructure breakdown and maintenance costs have risen sharply over the last several years. The buildings do not have wall insulation or energy efficient windows, which make heating and cooling a very expensive undertaking. Frame damage and warping make it nearly impossible to maintain the windows. The single pane windows are energy in-efficient. Winter moisture and summer heat have contributed to deterioration and failure of the wood siding. Dry rot and termite damage are evident in several areas especially in the bathroom and kitchen area around the sink. The electrical system is inadequate for today's energy demands and must be modernized for efficiency and to meet current codes. Insulation on some of the electrical wiring is deteriorated, increasing the risk of accidental fire or electrocution. Commercial power is often interrupted by outages and so emergency power generation is required.

The site's kitchen and pantry storage spaces are significantly undersized from the current standard. In addition, the restroom facilities are inadequate and are not designed for male/female crews, and are not accessible to the disabled. The facilities do not meet current American Disabilities Act (ADA) regulations.

The barracks/messhall heating, ventilating and air conditioning system is outdated and failing. Repair parts for this system are extremely difficult to find. In general, the living, bathing and kitchen quarters are cramped and provide neither a healthful nor a minimally accommodating living environment for the fire crews stationed at this site. The buildings do not meet current ADA standards for access or department standards for sleeping accommodations for both men and women fire-fighting personnel assigned to work at this facility.

Fawn Lodge FFS was designed to meet the operational needs that existed in the 1950s. Those needs have changed and the 50-year old station design is no longer adequate for a modern forest fire station facility. In the 1950s, station personnel consisted of all-male crews sharing a single bathroom and shower area. Barracks housed rows of beds within a large open space. Modern fire-fighting crews consist of both men and women. Current design includes bedrooms (with two bunks per room) to provide reasonable private space and separate restrooms. Dual bathroom/shower facilities, a physical therapy room, library, and living space are now needed at modern facilities. These additional needs require a barracks facility with a larger footprint than what exists at Fawn Lodge.

Modern fire engines are longer, taller, and wider than those used in the 1950s, and the apparatus buildings which house them need to be configured differently. The engine bays need to be taller, wider, and deeper to accommodate a modern piece of apparatus. The existing buildings do not meet current access requirements mandated by the American Disabilities Act specific to paths of travel and elevation. None of the buildings meet current fire and or building code and any repairs resulting in increasing the size of a building by 15% (such as adding a room) triggers the requirement to upgrade the entire building to current code.

The septic system at the existing facility can not be adapted for current needs through simple repairs. It needs complete replacement. The septic tank is located behind (west of) the apparatus building and the leach field is located west of the barracks about 40 feet from Grass Valley Creek. This system does not meet current code requirements and can not be repaired to meet current code requirements. This is why the current proposal will abandon the old system in place (in conformance with County requirements) and construct a new, modern septic system, built to current codes, on a relatively flat area on the hillslope east of the station. This location was selected to move it as far away from the creek as possible.

The drainage system at the existing station is also out of compliance with current code requirements and can't be easily corrected through repairs. Currently, a drain under the hose rack allows run-off to flow unfiltered and concentrated into the riparian area along the creek. The new station will include a curb around the entire paved area. All run-off will be collected and passed through a sand-oil separator (filter) where it will be dispersed and discharged into a vegetated swale. This change from current to proposed new conditions will have significant environmental benefits.

The possibility for an accidental fire due to inadequate electrical wiring (mentioned on page 7 of the CEQA document) is a serious safety threat at the Fawn Lodge kitchen/messhall which was built in 1935 and renovated in the 1960's. During the evening of September 27, 2009, fire broke-out in the messhall at CAL FIRE's Prado Conservation Camp in San Bernardino County. Fortunately, no one was killed or injured during the fire or during its suppression but much of the building was destroyed. Two independent fire investigators came to the same conclusion. The fire started in a wall electrical receptacle in the dining hall due to failure of electrical wiring in the wall behind the outlets. The Fawn Lodge kitchen/messhall was rebuilt about the same time as the messhall at Prado Camp and has similar electrical wiring deficiencies. Replacing the electrical systems at the station would require dismantling the walls down to the stud and reconstructing the walls after re-wiring.

These conditions can not be effectively corrected through minor repairs. It would be far more costly to try to upgrade existing buildings to meet current code requirements and design changes needed for current operations. The alternative of upgrading the existing buildings to meet current code and accommodate current use requirements would require them to be completely dismantled, rebuilt and expanded. This would be far more costly and inefficient than demolition and reconstruction, and if the purpose of considering this option is to maintain historical values at the station, this objective would not be met. The re-constructed buildings will have lost all historical integrity.

Funding for facility replacement is approved through the Capital Outlay Budget Change Proposal (COBCP) process. Funding for the project will come from the sale of Lease-Revenue Bonds – not directly from the General Fund. To qualify for this type of funding, facilities need to be rebuilt or replaced with new construction which is required to last at least 50 years. Funding for maintenance and repairs of existing facilities can only come from within the Department's existing special repairs budget which is used to repair and maintain all of its 3000+ buildings. Unfortunately, this amount is insufficient to cover the cost of any substantial repairs which are needed, particularly at 50-year old facilities where the repairs would be substantial, involve bringing projects into ADA compliance and up to current code. Previous and on-going requests for augmentation of the Department's special repairs budget have been denied. It might seem more reasonable to utilize funding for a substantial remodel and upgrade of the Fawn Lodge facility, but that option is not legally available to the Department through the Lease-Revenue bond funding process, and as explained above, there are insufficient special repair funds within the Department's budget to complete such a project. Even if it were cost-effective to remodel and repair the facility to meet current standards, obtaining this type of funding would require the submittal of a standard Budget Change Proposal (BCP) request to be funded from the General Fund which would not be approved in the current fiscal climate. Because of the critical deficiencies at this facility, and the need to carry out essential services at this location, CAL FIRE received approval from the Department of Finance to replace the Fawn Lodge facility with Lease-Revenue Bond funding which includes these restrictions. In addition to the problem with funding, when substantial improvements are proposed at an existing building, often it is necessary to bring the entire structure to the current Code. This is both from a structural and an ADA standpoint. Most if not all of our old structures would never meet the current Code, either structurally or from an ADA clearance issue, so the scope for upgrading would require "gutting" the structure. This can consist of removing roofs/walls and everything needed for Code compliance which is in addition to the simple retrofit or intended remodel. This scenario is more cumbersome and costly than demolition and starting over with a new building with new electrical wiring and ADA clearances, while complying with the current structural Code.

Protecting the lives and property of the citizens of California from destruction by wildfire requires an infrastructure including forest fire stations, air attack bases, conservation camps, fire roads and other critical facilities. There is indeed a significant State cost to build and maintain this infrastructure but its existence, placed at strategic locations within the State Responsibility Area, and kept in good operating condition, is needed to successfully implement the Department's mandate and mission.

All things considered, the option of making repairs or reconstructing existing buildings is not a feasible alternative. The no project alternative (i.e., maintaining the status quo) is also unacceptable because it does not resolve the need to correct critical deficiencies at this station.

Comment #7 (GB) Mark's opinion is that the Paymaster's Office has "a high degree of historical architectural integrity" and is potentially eligible for listing on the National Register, and the Kitchen/Messhall, despite changes, "still retains some of its historical character." Mark's opinion should be weighed even more heavily in the State's decision of removal. More and more of these wonderful CCC-constructed buildings are being lost as time goes on, so it is even more crucial to preserve

those that are left. Thornton's report for the State pointed out, in 1994, that there are "very few CCC offices left in the CDF [CalFire] inventory."

Response to Comment #7 The initial proposal to demolish both of the CCC-constructed buildings at Fawn Lodge was not a result of Department failure to fully appreciate their historical significance. Page 47 of the Final CEQA document presents the Department's assessment of significance of the CCC Camp Paymaster's Office. It states:

This building was determined by Thornton to be potentially eligible for listing on the National Register of Historic Places. It therefore qualifies as a significant historical resource as defined in State Law (PRC § 5024.1). Its proposed demolition, therefore, could be considered a significant environmental impact.

The initial proposal to demolish and rebuild was a result of the limited buildable area on the site, the need to bring buildings up to current code, and the engineering difficulties required to relocate one or both historical buildings across the bridge. The results of the Department's feasibility analysis (considering alternatives to demolition) is presented in the above-referenced December 4, 2009, memo – a copy of which is enclosed.

Comment #8 (GB) Mitigation for the removal of the two buildings, according to your report, includes a prior commitment by the State in "preserving 29 of its significant historic buildings to compensate for the impact of having to demolish others which could not be saved." In the Fawn Lodge buildings, the first thing to point out is that they would not have to be put into this could be/ could not be save category if this project were aborted or altered and allow the building to remain. There is an option here.

Response to Comment #8 As explained in Response to Comment #6, neither aborting the project nor upgrading existing buildings on site are feasible alternatives. However, the project has been revised to save the office.

Comment #9 (GB) In these 29 buildings the State promises to preserve, I would venture to say that are very few CCC buildings, and, of these, the Fawn Lodge buildings are either the only examples, or part of only a few examples, of CCC-constructed buildings that *were actually part of a CCC camp*.

Response to Comment #9 The 29 historic CAL FIRE buildings to be preserved are listed on pages 33-34 of the Department's Management Plan for Historic Buildings and Archaeological Sites (2001). This document is available on-line at: <http://www.indiana.edu/~e472/cdf/resources/plan.pdf> It is true that the list contains very few CCC-constructed buildings which were actually part of a CCC camp. There is one such entry on the list. It is the (1935) office at the Whitmore Forest Fire Station in Shasta County which, like the office at Fawn Lodge, was built as part of a CCC camp which once existed in Whitmore. As indicated in that Plan, CAL FIRE has relocated the Whitmore CCC Camp office building to a three-acre parcel nearby which is owned by the Whitmore Historical Committee. The Historical Committee plans to restore it and use the building as a museum and centerpiece for community gatherings.

Comment #10 (GB) In California, the large majority of CCC-constructed buildings were constructed in the National Forest in the form of lookouts, Forest Service guard stations, and administrative buildings within the dozens of Forest Service district and forest compounds. Very few of these buildings remain that were actually part of the CCC camp itself. More value should be placed on these two rare buildings at Fawn Lodge than what is related in your report. They are a priceless, nonrenewable part of our history that cannot be adequately mitigated if removed.

Response to Comment #10 As stated in Response to Comment #7, the IS/MND and EIR clearly recognizes the historical significance found in both surviving CCC buildings. This is especially true for the office, because, unlike the kitchen/messhall, the office has retained its historical integrity. As stated in the response to Comment #5 above, the Department has explored several options for a revised site plan and has selected a plan which will retain the historic office.

Comment #11 (GB) Trinity County history is important to me, and I would guess that none of the 29 "committed" State buildings are within our county. The two Fawn Lodge buildings should also be preserved for the sake of Trinity County history.

Response to Comment #11 The proposed project has been revised. One of the two historic buildings (the office) will now be preserved in place. As discussed in the December 4, 2009, memo, there was no feasible way to save the kitchen/messhall.

Comment #12 (GB) According to your report, reasons for the buildings' removal include (1) they are old buildings with some maintenance needs, (2) there is a lack of security, (3) there presently is less than full compliance with present health and safety standards, (4) there is asbestos in some of the siding and tile flooring, and (5) the flood plain requires that the whole site be elevated with fill. The buildings could be continued to be occupied on a repair and maintenance basis that would be much cheaper than building this whole new compound that also includes major landscaping and fill.

Response to Comment #12 As explained in Response to Comment #6, it is infeasible to carry-out the needed improvements to the facility on a repair and maintenance basis, nor would it be less expensive.

Comment #13 (GB) Certainly there must be reasonable ways to increase security that does not include the major upheaval of this flat.

Response to Comment #13 The current station does lack security and improved security will be one of the benefits from the project but the need to reconstruct the station is not justified on the basis of lack of security alone. The discussion on page 7 of the Final CEQA document, and quoted in Response to Comment #6 list some of the most critical deficiencies at the station.

Comment #14 (GB) There must also be ways to address the health and safety issues without the massive changes. Perhaps an extra restroom facility could be added that makes it easier for both sexes and which also allows handicapped access.

Response to Comment #14 Adding an extra restroom facility would resolve some, but not all of the deficiencies. As explained in Response to Comment #6, repairing or upgrading existing buildings is not a feasible alternative.

Comment #15 (GB) From what I understand, asbestos usually isn't a real problem in the siding and flooring unless you intend to tear the siding and flooring out. It should not be much of a problem as the buildings are now.

Response to Comment #15 The only option which would not require management of Asbestos-Containing Materials (ACM) which may occur in the building siding and floor tiles is the no project alternative. As stated in Response to Comment #6 this is not a feasible option. Careful management of ACM is required during demolition or when making repairs requiring removal or cutting through those materials. The procedures CAL FIRE will follow are discussed on pages 8 and 27 of the Final CEQA document.

Comment #16 (GB) Regarding the flood issue, Fawn Lodge apparently survived the 1964 Christmas Week Storm without any problem. Geologists who looked at the "geological record" considered this as a flood that happens about every 1,000 years. If the buildings could stand that natural disaster in 1964, I would think they will continue for many more dozens of years without any real threat.

Response to Comment #16 For CEQA purposes the Department initially considered it low risk for flood threat, however during subsequent research, a new issue emerged. During due diligence review to satisfy lease-revenue bond funding requirements, the Department discovered that the Fawn Lodge FFS is located within Zone A of the Flood Insurance Rate Maps (FIRM) produced by FEMA. Placement in Zone A of FIRM means the station is located within a potential flood zone, although FEMA has not established a base elevation for flood risk at this location. To remain eligible for lease-revenue bond funding, the Department needs to determine the base elevation and build above it. Fortunately, a gauging station exists on Grass Valley Creek (at the station) which has produced flow volume data going back to 1965. Department Engineers are working with the California Geological Survey to interpret the flow data to establish the base elevation and determine the amount of fill needed at the station. This issue will not affect the preservation of the historic office building. The project has been revised to save it *in situ*, so no fill will be placed at that location. The Project Description has been revised on page 8 of the Final CEQA document to clarify why the elevation needs to be raised.

Comment #17 (GB) On whether or not the removal of the buildings would affect the "scenic vista" along Highway 299, I believe that it would. For many years, my family and I drove from the Bay Area up to Denny. As a child, even though I didn't have much interest in buildings then, I considered these little structures to be very attractive in their settings and with the American and State flags flying out in front. At that time, in the 1950s, the highway went right past the compound. Our family treated Fawn Lodge as a landmark along the way and referred to it in respect to how far we had driven on our route. Later, now that the highway has been rerouted, I can still see these building from the highway, and I notice them every time

I go past. To me - and I would bet also to many other people - Fawn Lodge with its historic buildings is still a local landmark.

Response to Comment #17 CAL FIRE recognizes that Fawn Lodge is a local landmark; however that section in the CEQA document pertains to its visibility from the highway and whether a scenic view will be affected during implementation of the project. Most of Fawn Lodge Forest Fire Station is not visible or recognizable from Highway 299 as it is blocked by mature timber intermingled with riparian vegetation. A wary eye that is familiar with the facility may catch a glimpse of the south side of the apparatus bay, which is closest to the highway, through a small opening in the vegetation. No other buildings are visible. Were it not for the Fire Station Sign and associated flag poles at the highway, the facility would be virtually invisible. The Department edited the discussion on page 33 of the Final CEQA document to disclose that a glimpse of the south side of the apparatus bay can be seen through an opening in the vegetation located between the highway and the station. As stated on pages 10, 16, 27, 38, and 40 of the Final CEQA document, some 25-30 trees will be removed. No trees will be removed from within the riparian, thickly-forested area along either stream. Neither the removal of 25-30 trees nor the demolition/replacement of the buildings will be visible from the highway. Implementation of the landscaping plan following construction will keep the beauty of this station intact. CAL FIRE stands by the original assessment that the project will not adversely impact a scenic vista.

Comment #18 (GB) With this letter, then, I am asking CalFire to select the “no action” alternative and continue using the station as it is, with repair and maintenance as necessary. The removal of these two buildings would be a significant adverse effect to the cultural resources and would be a significant adverse effect to the scenic vista. Their loss would be a loss to Trinity County history.

Response to Comment #18 As discussed in Response to Comment #6, that option would not correct all the station deficiencies and would be more costly to carry-out.

Comment #19 (GB) The removal of the buildings, with the following extensive bulldozer work and the construction of new buildings would be a significant adverse effect to the California State budget, as well.

Response to Comment #19 As discussed in Response to Comment #6, the option of tearing the buildings apart to replace wiring and plumbing, knocking-out interior walls and adding additional square footage to accomplish the needed building design would be far more costly, less effective, and would still remove historical integrity. Additionally, this project will have a minimal impact on the State's \$135 billion dollar budget.

Comment #20 (GB) I would also ask you to expand the timeframe to accepting public comments.

Response to Comment #20 The CEQA Guidelines [14 CCR § 15105(b)] address the requirements for the length of the public review period for proposed mitigated negative declarations as follows:

The public review period for a proposed negative declaration or mitigated negative declaration shall be not less than 20 days. When a proposed negative declaration or mitigated negative declaration is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 30 days, unless a shorter period, not less than 20 days, is approved by the State Clearinghouse.

The public and agency review period for accepting written comments on this proposed project began on September 14, 2009, and closed on October 13, 2009, (30 days) which is in conformance with the above-cited regulation. As discussed in the Response to Comment #27 below, and in an email sent to Gay Berrien on October 8, 2009, CAL FIRE has determined not to extend the public review period.

Comment #21 (GB) I and several others are very disturbed that CalFire chose this way to advertise this project. Posting the proposal at and near the location and then having the full report only available at a few State offices and on the CalFire webpage to us is not making much of an effort to inform the public. How many of us are in the habit of checking the CalFire webpage every couple of weeks? The U.S. Forest Service may get lambasted for many things over the years locally, but it makes an extra effort to keep the announcements in the newspapers—besides also showing all this on its webpages. CalTrans, which is also a State entity, works under CEQA, too, and yet we are kept well informed about proposed highway projects.

Response to Comment #21 The Trinity County Historical Society and members of the public residing in Trinity County were first notified by the Department of need to demolish these two historic buildings in 2001. CAL FIRE

sent a copy of its Draft Management Plan for Historic Buildings and Archaeological Sites and the Draft Environmental Impact Report (DEIR) which addresses impacts from that Plan directly to the Trinity County Historical Society, posted a copy of that document in the County Library in Weaverville, and published notice of the project in state-wide distribution version of the Sacramento Bee on January 17, 2001. No comments were submitted from Trinity County.

As discussed on page 47 of the Final CEQA document, the proposal to demolish these two historic buildings at Fawn Lodge was first presented in the Department's Management Plan for its Historic Buildings and Archaeological Sites which was developed from 1995-2001. Prior to its approval in 2001, the draft plan was circulated for extensive public review. The DEIR addressed the significant environmental impact resulting from eventual loss of a number of significant historical buildings. The Plan and DEIR were developed in close consultation with the California State Office of Historic Preservation. The Plan includes a commitment for long-term preservation of 29 of the Department's 86 significant historical buildings, recognizes that the eventual loss of the remaining 57 significant buildings will result in a significant environmental impact, includes a program of compensatory mitigation for the eventual loss of these buildings, and includes a statement of overriding considerations. The 29 buildings chosen for preservation were selected based upon consideration of fiscal constraints, condition of the buildings, ownership/control problems, closure and abandonment of facilities, and engineering or operational difficulties which would result in attempting to preserve buildings at certain facilities. The two historic buildings at Fawn Lodge were not selected for preservation because of the need to replace the facility within the small size of the buildable area.

The DEIR (SCH #99021015) went through extensive public and agency review before it was certified and the final plan adopted. A Notice of Availability (NOA) was published in the statewide edition of the Sacramento Bee on 1/17/01 (at a cost of \$2773.26.) The NOA stated that copies of the DEIR were located in several key locations within the affected counties. One such place where the DEIR was made available was the Trinity County Library. Additionally, a State Environmental Planner (Maria Sosa) was listed as a contact to provide anyone with a copy of the DEIR upon request. The Trinity County Clerk/Recorder received a copy of the NOA to post pursuant to CEQA section 15087(d). The County Clerk/Recorder and County Library are both located in Weaverville. In addition, the DEIR was sent to the State Clearinghouse (15 copies), Responsible Agencies, Native Americans, Affected Counties (including the Trinity County Clerk, Trinity County Planning Department, and Trinity County Library), Interested Groups and Individuals, Forest Fire Lookout Associations, Historical Societies, and Information Centers.

In 2001, a copy of the DEIR was mailed directly to the Trinity County Historical Society inviting comments. After consideration of all comments, copies of the Final EIR copies were sent to all commenters (10 day review). No commenters were located in the Trinity County area. No comments were submitted by the Trinity County Historical Society nor were any comments submitted by Trinity County Planning Department nor from any member of the general public residing in Trinity County.

This second CEQA document disclosing the proposed Fawn Lodge FFS Replacement project was circulated for public and agency review and comment for a review period of 30 days as indicated on the Notice of Intent to Adopt a Mitigated Negative Declaration (NOI). The 30-day public review period for this project began on September 14, 2009 and ended on October 13, 2009. The requirements for providing notification to members of the general public are found in CEQA Guidelines §15072. These guidelines require CAL FIRE to notify the general public by utilizing at least one of the following three procedures:

- Publication in a newspaper of general circulation in the area affected by the proposed project, or
- Posting the NOI on and off site in the area where the project is to be located, or
- Direct mailing to the owners and occupants of property contiguous to the project.

CAL FIRE elected to utilize the second of the three notification options. The NOI was posted at the following four prominent locations on and off site in the project area:

1. At the current station office within the Fawn Lodge FFS compound where it was prominently in view by any person visiting the station.
2. At the junction of Highway 299 and the access road leading into the station where it could be readily seen by anyone passing through this area.

3. At the public-greeting counter at CalFire's Shasta-Trinity Unit Headquarters in Redding.
4. At the Trinity County Clerk/Recorder's Office in Weaverville.

A complete copy of the CEQA document was made available for review at Locations #1 and #3 above. An electronic version of the NOI and the complete CEQA document were made available for review for the entire 30-day review period through their posting on CalFire's Internet Web Pages at: http://www.fire.ca.gov/resource_mgt/resource_mgt_EPRP_PublicNotice.php CAL FIRE submitted 15 copies of the draft CEQA document to the State Clearinghouse for distribution to Responsible and Trustee Agencies and sent a copy to the Trinity County Planning Department.

On September 14, 2009, upon the society's request, the Department sent electronic copies, via email, of the complete 97-page CEQA document and the Notice of Intent. In that email message the society was encouraged to distribute the documents and information to any other interested member of the Trinity County Historical Society. The message invited comments, provided instructions on how to submit written comments for CAL FIRE's consideration, and contained a reminder that the 30-day public and agency review period would close on October 13, 2009. On September 21, 2009, upon his request, CAL FIRE sent the Notice of Intent and the complete CEQA document to Trinity County Supervisor Roger Jaegel with an invitation to submit written comments.

As stated in Response to Comment #4, the public notification procedures used for this proposed project are entirely in conformance with CEQA. The Trinity County Historical Society was sent a copy of the draft Historic Buildings Management Plan and DEIR in 2001 with an invitation to submit written comments. Although extensive comments were submitted from several of the affected counties and numerous reviewing agencies, none were submitted by any public agency or member of the public within Trinity County. Since the Department had previously notified Trinity County Historical Society that the two buildings at Fawn Lodge would eventually be removed when the station was replaced, it elected to use the NOI posting method for this CEQA document to make sure neighbors and those adjacent to the project, who had not received the 2001 mailing, were notified of the proposed project and given a reasonable opportunity to submit comments regarding environmental impacts.

Through the email on September 14, 2009, the Trinity County Historical Society was notified about the proposed project and again invited to comment on the potential environmental effects.

The fact that 12 letters of comment containing 56 comments were received indicates that the public notification procedures were successful in recruiting public participation in the CEQA review process.

Comment #22 (GB) Rich Jenkins mentioned to me, and you also mentioned to me, that CalFire had made a real effort to find alternatives for the two buildings, including the prospect of moving them to another location. If the State was so active in identifying partners or interested parties to help in this effort, then why wasn't the Trinity County Historical Society contacted at some point months ago? You have to admit that 30 days does not give anyone much time in considering this situation.

Response to Comment #22 As discussed in Response to Comment #21, the Trinity County Historical Society was first notified of the eventual plan to demolish these two buildings at Fawn Lodge in 2001 during public review of the ADEIR which addressed the impacts to historical resources. The 30-day timeframe is established in the CEQA Guidelines, as discussed in Response to Comment #20.

Comment #23 (GB) The Historical Society, like most nonprofits, holds its board meetings once a month. Certainly giving the society only one month to look into different alternatives for two unique historic CCC buildings is not reasonable at all. It is likely the society cannot find a quick solution to this problem, but it would have been conscientious of you to contact this group. (Rod Plew, President, 623-5211, P. O. Box 333, Weaverville, CA 96093).

Response to Comment #23 This concern has been addressed in Response to Comment # 20, 21, and 22.

Comment #24 (GB) After reading your report and the explanation of the method of advertising the one-month-long window for comments, I realize that if Bob Maxey hadn't alerted the historical society about it, we would never have been made aware. There was no plan for CalFire to mail a notice, or to run an announcement in the *Trinity Journal*.

Response to Comment #24 CAL FIRE under contract to California State University, Stanislaus engaged the services of Lewis Napton, Ph.D. and Elizabeth Greathouse, M.A., to conduct cultural resources investigations of the Fawn Lodge Forest Fire Station and adjacent 80 acres as part of the environmental impact assessment discussed in the CEQA document. Only July 15, 2009 they visited the J. J. Jake Jackson Memorial Museum in Weaverville to research the history of the Fawn Lodge CCC Camp. They spoke with Bridget Carson, Director, and museum staff members who provided helpful advice and access to local research materials.

During his work in the development of the CEQA document, Dan Foster consulted over the telephone with Trinity County Historical Society members Bob Maxey and Hal Goodyear. On September 14, 2009, the Department sent a complete copy of the CEQA document to Historical Society Member Bob Maxey.

Notification to the Trinity County Historical Society of the proposed project was accomplished directly as a result of successful outreach and consultation efforts made by the Department. Since the Historical Society was given a complete copy of the CEQA document and NOI on September 14, 2009, had the entire 30-day period to submit comments, and did in fact submit numerous written comments, the Department has met all public comment requirements under CEQA.

Comment #25 (GB) If you and your staff were truly wishing for the preservation of these buildings, I would have thought you would have contacted a local group of people who have had a great deal of experience with Trinity County history and preservation of buildings and artifacts.

Response to Comment #25 As discussed in Response to Comments #21, 22, and 24, many local people were contacted directly by Department staff and cultural resource consultants working for the Department. The difficulties in preserving the two historical buildings were not related to any lack of appreciation of their rarity or historical significance. The problems were related to project design and engineering constraints associated with building upon such a small site.

Comment #26 (GB) On a different subject from Fawn Lodge, I wanted to mention a mistake on Page 11 of your report. There it is written, "Since the 1880s the lumber industry has been the most important source of employment in the area." This is not true. In the 1880s through to probably the 1930s or the 1940s, the lumber industry consisted of various sawmills located in different areas to provide local needs. However, the sawmills and lumber did not provide a major source of employment during that time period. In the 1800s hydraulic placer and hardrock gold mining made up the primary industry, of course also using the sawmills for timber and flume lumber and such. It wasn't until much later that the Forest Service began its commercial timber sales (probably 1940s and, downriver here, 1950s) when there were roads enough to accessing areas to be harvested and then transporting the logs, etc. Then, of course, the timber industry did become very important to us.

Response to Comment #26 The discussion of Trinity County employment history document has been edited on pages 11-12 of the final CEQA document to include this information.

Comment #27 (GB) I'm on the Board of the Trinity County Historical Society. I've been authorized to ask you, if possible, to add something that our president, Rod Plew, already sent to your office in reference to Fawn Lodge (Rod is on vacation right now). The Historical Society would additionally like to request that CalFire extend the public review period. We believe one month is not sufficient. Thank you for considering this.

Response to Comment #27 On October 8, 2009, in an email sent from Dan Foster to Gay Berrien, CAL FIRE responded to this request as follows: Dear Ms. Berrien: I submitted your request (to extend the public comment period) to Department Management and the answer is no. The 30-day public comment period will close at 5:00pm on October 13, 2009 as scheduled. If you wish to submit additional written comments for CAL FIRE's consideration, these must arrive before that time on that date. After the close of public comment period, the Department will carefully review and consider all comments submitted. Each submitter will receive a letter containing our response to the comments.

Comment #28 (BM) The new design for the station does not take into account the historical significance of the site. Fawn Lodge is part of the foundation of the California Department of Forestry and Fire Protection (CAL FIRE). We should remember that the California Conservation Corps (CCC) is a part of our foundation, where many of our CAL FIRE

employees came from. It would be a shame to destroy the Paymaster's house, which is the "only 21' x 25' CCC era office in the CAL FIRE building collection" (Thornton 1994).

Response to Comment #28 As discussed in the December 4, 2009, memo, in the Final CEQA document, and in Response to Comment #5, the Department has revised the proposed project to preserve and maintain the historic CCC Paymaster's Office.

Comment #29 (BM) I just don't think that destroying Fawn Lodge Forest Fire Station, as we know it, is in the best interest of the taxpayer's dollars. The station needs a remodeling and much needed maintenance, which in the past has always been deferred. Understanding that the state is not a typical homeowner, repairing termite damage and dry rot is the normal course of action for maintaining structures.

Response to Comment #29 As discussed in Response to Comment #6, the alternative of remodeling the existing station buildings and facilities would not resolve the operational problems discussed in the CEQA document, nor would that alternative correct environmental problems related to the septic and drainage systems at the existing facility.

Comment #30 (BM) The report states that it's necessary to raise the station site above the 100-year flood plain; however, on page 56 of the same report it is stated that there is no known 100-year flood hazard map for the area. The station has never had a flood problem near its building in my 27 year tenure with the Shasta Trinity Ranger Unit.

Response to Comment #30 See Response to Comment #16.

Comment #31 (BM) Currently, the kitchen at Fawn Lodge is large enough to handle a crew of 12 to 14. There is enough dining room square footage to handle another table for an additional 12+ diners. I have personally held luncheons for 40 + guests and the facility worked very well. Office staff came from Redding for lunch at Fawn Lodge and all were seated along with the crew for the occasion. The block/brick foundation under the kitchen was installed by Crystal Creek crews in the late 1960's. That job was supervised by Ranger One Jack Trapp, who still lives here in Redding. In regards to the barracks, the only improvement needed would be a new building, in the foot print of the present one. This would answer the questions on how to incorporate separate male and female restrooms, as well as handicap facilities.

Response to Comment #31 See Response to Comment #6.

Comment #32 (BM) With the amount of calls from Fawn Lodge Forest Fire Station, I don't feel that a drive through garage is a necessity. In the 10 years that I was there, we never had a problem backing one of our engines into the garage. If the openings of the current three door garage are too small, then it could simply be remodeled to have two wider doors.

Response to Comment #32 The purpose of implementing the project is to correct numerous operational and environmental deficiencies discussed in the CEQA document and in Response to Comment #6. That response also explains why simple repairs or remodel to existing buildings will not correct the problems, nor would such an alternative be less costly. The apparatus building, constructed in 1953, was not designed to house a modern piece of apparatus. The Department believes the drive-through design is superior and includes that design in all new construction.

Comment #33 (BM) The proposed plan shows the septic system on the eastern part of the property, which is a hillside. Even if they find room for the required leach field, it will require a pumping system to raise the effluent up to the new septic system. This sounds like an increase in maintenance cost to me.

Response to Comment #33 The problems with the existing septic system and reasons why this location was selected are discussed in Response to Comment #6.

Comment #34 (BM) Landslides are addressed as "no impact", yet it is proposed to cut into the existing hillside with bulldozers. Any cut into a hillside in Trinity County without retaining walls will result in landslides in a wet winter. Decomposed granite has a habit of moving once disturbed.

Response to Comment #34 The highly erodible nature of the decomposed granite soil type in the Grass Valley Creek watershed is discussed in the CEQA document and in the December 4, 2009, memo. The construction of the original station in 1953 included cuts into hill slopes which did not lead to landslides. This project, designed

by civil engineers, includes the construction of retaining walls, and use of engineered compacted fill. As stated on page 27 of the Final CEQA document, a Storm Water Pollution Prevention Plan (SWPPP) and Best Management Practices will be developed in consultation with the Regional Water Quality Control Board to prevent erosion. The Department stands by its impact analysis of no impact with respect to potential for landslides.

Comment #35 (BM) Replacing the old building at Fawn Lodge will not make an improvement in overall response time. To achieve this, the station would have to be relocated closer to Highway 299. Regardless of garage type, you must drive out of the yard, across the bridge and up to the highway before heading east or west to begin responding to a call.

Response to Comment #35 The Department considered the possibility of selecting another piece of property to build a new facility but this alternative was rejected because of the significant increase in the cost of the project, the additional time required to seek funding and approval to acquire new property, and the fact that the various parcels which were available did not meet CAL FIRE's operational needs. The Caltrans parcel located near Buckhorn Summit right off of Highway 299 was initially considered but rejected for environmental reasons. The property has been used as a vehicle maintenance yard and the soil is highly contaminated. Choosing this site for the new station would have required a major clean-up effort. The Department did not wish to accept the liability or the substantial increased cost for the clean-up. Costs and staff time associated with CEQA-compliance was also a factor in rejecting this alternative.

The State owns 80 acres of land behind the existing Fawn Lodge Forest Fire Station and one possible alternative site was considered upon those lands. This site also was rejected for environmental reasons. It would require a major reconstruction of the access road which is located within the Watercourse and Lake Protection Zone (WLPZ) along Grass Valley Creek and Phillips Gulch. These streams have special erosion-control restrictions due to their sensitive, highly-erodible decomposed granite soils in the watershed. Grass Valley Creek also supports Coho Salmon and Steelhead, and needed road reconstruction would potentially result in significant environmental impacts to the anadromous fish habitat. The State chose to remain on the existing compound to avoid those impacts.

A third potential parcel considered for possible relocation is located close to the community of Lewiston. This parcel was also rejected because of the impact on incident response times. The current station location provides the best response to the Direct Protection Area (DPA) that CAL FIRE protects in Trinity County. In 2007, CAL FIRE relocated the Weaverville Station (60) to Highway 3, approximately four miles north of Weaverville. The two engines at Fawn Lodge often respond to the Highway 3 and 299 corridors west and south of Fawn Lodge Station. With the new location of Station 60, responses to these locations are better strategically served from Fawn Lodge Station's current location.

Comment #36 (BM) I disagree with the statement that there would be a "less than significant impact" on the existing visual character and quality of the site (page 33). In the long term, even if you disregard the historical value of the station itself, the loss of 25-30 conifers will take more than a significant amount of time to mitigate.

Response to Comment #36 See Response to Comment #17.

Comment #37 (BM) No one from past crews or those familiar with Fawn Lodge can understand the need to change this historical station. It is evident that those responsible for wanting or proposing a new compound at Fawn Lodge have never stayed a day or two there and enjoyed the unique surroundings. Fawn Lodge has been experience by many past and present administrators. The history of who has gone through Fawn Lodge runs from Unit Ranger Howard Bromwell to the present Battalion Chief of Weaverville-Fawn Lodge. If Fawn Lodge is destroyed and a new installation is built, another historical aspect of CAL FIRE history will be lost forever.

Response to Comment #37 CAL FIRE recognizes the station's beauty. It also recognizes the fact that unfiltered wastewater discharges and septic system placement adjacent to a fish bearing watercourse impacts the natural environment and conflicts with current requirements. It also recognizes the operational difficulties, safety risks, and energy inefficiencies in continuing to operate essential services at this 56 year old facility. CAL FIRE believes that the current project design takes the beauty of the station into account while completing needed improvements.

Comment #38 (BM) How much consideration has been given to the relocation of Fawn Lodge F.F.S. Now would be the time for relocation, based on fire occurrence history of the response area. Then the state could dispose of the eighty plus

acres at Fawn Lodge F.F.S. as excess property. The old Cal Trans Buckhorn maintenance site comes to mind. Instant access to Highway 299 without a long driveway, plus no fifty year flood problem or maintenance of a bridge, very little site prep and a large shop floor and foundation already there. Also a water system on site. The station would be in full view of the public, being next to the highway. A new site based on a response history would improve initial attack times, as the Department continually strives for improvement. As I remember most responses were towards Lewiston, with that in mind it would be logical to look for a site at the top of the hill on Lewiston Road.

Response to Comment #38 Please see Response to Comment 35.

Comment #39 (BM) All things considered, the most economical way would be to build a new barracks at Fawn Lodge and remodel the rest.

Response to Comment #39 As explained in Response to Comment #6, and #31, the option you suggest is not feasible and would not correct all the deficiencies.

Comment #40 (RP) The Trinity County Historical Society has been reviewing your report on the State's proposal to rebuild on the Fawn Lodge Fire Station site, which will include the removal of two historical Civilian Conservation Corps (CCC) buildings. The Historical Society strongly urges you to preserve these buildings, rather than tear them down. The best alternative is to leave them at their original location and continue to use them.

Response to Comment #40 The Department is pleased to report that the project has been revised to retain the historic CCC Paymaster's Office; it was not feasible to retain the Kitchen/Messhall. As discussed in Response to Comment #6 leaving both buildings and continuing to use them at their original location would not accomplish the improvements needed at this facility.

Comment #41 (RP) The Historical Society has had some experience with old buildings and their upkeep. In reading your report we can empathize with some of the things happening to the two buildings, such as evidence of some termite damage, but we don't see anything that can't be corrected. Even some of the more expensive repairs or modifications to the buildings, we believe, would still not come close to the expense of the razing, excavation and bulldozing, and new building constructions that CalFire proposes here.

Response to Comment #41 See Response to Comment #6.

Comment #42 (RP) There is a variety of options in increasing security for a building or group of buildings. The Historical Society has used several of these options in taking care of the very sensitive and valuable artifacts inside the Jake Jackson Museum as well as the buildings outside in our historical park. We would not think that security would be a critical enough reason to replace the Fawn Lodge historic buildings.

Response to Comment #42 See Response to Comment #13.

Comment #43 (RP) Our museum has some of these same issues with some lack of handicapped access to some of the exhibits. Some of these things would be good to fix, but are not mandatory. There are many ways you can bring these standards up without having to destroy the historic buildings.

Response to Comment #43 See Response to Comment #6.

Comment #44 (RP) This is the situation in many buildings of this time period. There have been many CCC-era Forest Service buildings that have been removed and dismantled over the years. (Thus, the increased necessity for keeping the Fawn Lodge structures). There has been asbestos present in those buildings. We understand that there was no real problem with the continued occupancy of the buildings, so long as the siding and flooring was mostly left alone. When it came time to remove the buildings, however, proper hazardous material procedures had to be followed.

Response to Comment #44 See Response to Comment #15.

Comment #45 (RP) Those of us who were living in Trinity County during the 1964 Flood (Christmas week) wonder how there may be a potential flooding problem at Fawn Lodge when it came through that massive, unprecedented rainstorm without being affected. The likelihood of another flood like that is very small. CalFire would do well to save the planned expenditures for something else.

Response to Comment #45 See Response to Comment #16.

Comment #46 (RP) The Historical Society does not believe the discussed mitigation is sufficient for replacing the loss of the two Civilian Conservation Camp buildings at Fawn Lodge. The Paymaster Cabin was cited by Mark V. Thornton in his 1994 report as being potentially eligible for listing on the National Register. The Kitchen/Messhall had had some changes, but according to Thornton, despite the changes, “still retains some of its historical character.” Now, fifteen years later and probably after more CCC building have been destroyed by the various agencies, Thornton’s opinion should be considered even more strongly by CalFire in the planning for the Fawn Lodge site. Instead of devising ways to get rid of the buildings and replace them, effort should go into continuing their use and modifying the upgrading as necessary to keep them active and healthy.

Response to Comment #46 See Response to Comment #21.

Comment #47 (RP) The report’s explanation that CalFire has made a commitment to preserve 29 historic buildings, this making the removal of the two Fawn Lodge buildings easier to bear, leaves some things to be desired. The 29 structures probably only include a few that were CCC-era, and of those fewer CCC-era “committed” buildings, there are probably even fewer-or none-that were actually part of a State-operated CCC camp. The Historical Society believes that Fawn Lodge buildings are much more important than what the report attempts to show. If anything, the two Fawn Lodge buildings should be made part of the “committed” list.

Response to Comment #47 See Response to Comment #21 and #46.

Comment #48 (RP) Contrary to the conclusions shown in the report, the Historical Society believes that if the project is allowed to go forward, there definitely will be a significant adverse effect to cultural resources, for the reasons already stated above.

Response to Comment #48 CAL FIRE recognizes the historical significance of both buildings and that their demolition would constitute a significant environmental impact. That activity requires an EIR to address the significant environmental impacts resulting from the project. That EIR was certified in 2001 with a Statement of Overriding Considerations.

Comment #49 (RP) Residents of Trinity County, and people traveling through, see Fawn Lodge as a real landmark along the highway. People still notice it from where the highway was rerouted some years ago. The buildings are very aesthetic in their historic setting. We can guess that many of the engine crew personnel who occupy the flat during the fire season also have some real pride and interest in the old buildings.

Response to Comment #49 See Response to Comment #17.

Comment #50 (RP) The Trinity County Historical Society asks you to choose a “no action” alternative on this project proposal. Let some of CalFire’s dollars go into the continued integrity and preservation of these two unique and irreplaceable buildings.

Response to Comment #50 See Response to Comment #6.

Comment #51 (EH) I am writing to voice my opposition to the removal of these two historical valuable buildings. Little by little, the CCC buildings are disappearing. You as a state agency have a responsibility to preserve these buildings. Before you do anything you should take an inventory of all CCC buildings in California. This will give you an idea how much an impact the removal will have.

Response to Comment #51 See Response to Comment #5.

Comment #52 (EH) As with any historical important building the two buildings should be remodeled on the interior. They could be brought up to date with all the modern requirements and facilities. The remodel job could be a project for the local college building class. The only thing the state would pay for would be materials. This would reduce the cost to the state and be good public relations.

Response to Comment #52 See Response to Comment #6.

Comment #53 (JS) As an advocacy group for the history and heritage of the Civilian Conservation Corps, I have been contacted by one of our members, Gay Berrien, about the proposed work at Fawn Lodge. Civilian Conservation Corps Legacy, Inc. works with people across the nation on the task of remembering the heritage of the CCC and its vast legacy to our country. Although I have not personally seen the buildings in question, I would ask that you use every possible consideration in their preservation.

Response to Comment #53 See Response to Comment #5.

Comment #54 (JS) Last year the CCC celebrated the 75th anniversary of its establishment. In those 75 years, this early slice of conservation heritage has disappeared quickly. As a nation we are presently struggling with the notion of how we should conduct ourselves as we are confronted with modern natural resource issues. Drawing of the lessons of the past plays an important part of development for the future. The preservation of the few remaining CCC built camp buildings is very important to sharing the story of the CCC and enabling our citizens to have a first hand view of what it was like to live in a CCC Camp. After WWII, most camps were disposed of and buildings were sold, recycled, and otherwise destroyed. The very few remaining buildings stand as a symbol. Most CCC camp foundations are now hidden among 65 years of brush and trees. Their purpose and contribution has become unknown to our citizens and even avid CCC advocates are unable to identify their location after intensive research. CCC history in America has reached a point where all signs of its existence are very important. In California knowing a location of a camp and actually having a CCC building is very special. As you go forward with your decision making process, do not forget that when these buildings are gone so will be the landmarks that remind the California Department of Forestry and Fire Protection of its early agency heritage and California citizens that they once played a part in the greatest conservation effort ever recorded in America.

Response to Comment #54 The Department recognizes that CCC camp buildings are rapidly disappearing across the nation and is pleased to have found a way to save two of them on CAL FIRE's properties (See Response to Comment #5). In addition to the Fawn Lodge FFS, the Department worked cooperatively with the Whitmore Historical Society to relocate and save another CCC Camp office located in eastern Shasta County California which was initially slated for demolition.

Comment #55 (JS) I am presently on travel and am submitting my comments on Fawn Lodge prior to today's deadline. I am sorry that this is not on official letterhead nor does it contain my signature as president of national CCC Legacy, Inc. I extend my apologies and will be able to send an official letter once I get back to the office next week if you should desire.

Response to Comment #55 In an email sent on October 13, 2009, the Department responded as follows: "No problem with the email format and lack of letterhead, etc. You will be receiving a response to comment letter from us, after we complete our work in considering the comments and various options. It may be two months before that arrives, perhaps even longer, so wanted to tell you that your email has arrived and we will consider your comments along with the others which have been received. Thanks for participating in the CEQA review process."

Comment #56 (JS) As someone who often interfaces with tax-payer based organizations for the purpose of bringing attention to historical preservation, I am certainly sensitive to the problems associated with trying to meet the needs of the future. Thanks for your service to the State of California.

Response to Comment #56 The Department sincerely appreciates your recognition of our service to the people of California and the professional and respectful manner in which you presented these comments.

Copies of Comment Letters

With Comment Number Identified

From: Dean Prat [DPrat@waterboards.ca.gov]
Sent: Thursday, October 01, 2009 9:23 AM
To: Foster, Dan
Cc: Dreesmann, Kelly
Subject: Fawn Lodge Forest Fire Station Initial Study/MND

Dear Dan,

I have reviewed the subject environmental document that was sent directly to my attention. Thanks for the opportunity. The document looks good. My only question relates to potential discharges of wastewater from the new hose wash rack. I do not know if/what soaps or cleaners are used or what is involved with fire hose washing. I can imagine some dirty discharges. I did not find any description of this activity in the document. How is the wastewater handled and where will hose wash wastewater be discharged?

#1

I'm not sure if we have or will receive another copy of the document from the State Clearinghouse so I'm placing my copy at the starting line of our CEQA review process as I head out of the office for a couple weeks. You may get a separate comment letter from this office.

Sincerely,
Dean Prat, P.G.
Engineering Geologist
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Ste. A
Santa Rosa, CA 95403
(707)-576-2801 ph.
(707) 523-0135 fax
dprat@waterboards.ca.gov

From: Anton jaegel [rj@snowcrest.net]
Sent: Friday, October 09, 2009 8:24 AM
To: Foster, Dan
Cc: gberrien@wildblue.net
Subject: Fawn Lodge CCC buildings

Mr. Dan Foster:

Following are some brief comments on the Fawn Lodge Mitigated Negative Declaration:

-Under the National Historic Preservation Act both of the CCC buildings must be preserved on site and in place.] #2

-There is more than enough room on the properties to place the new structures in locations that do not displace the CCC buildings.] #3

-The public notification requirements for the CEQA document were not in accordance with the law.] #4

Anton R. Jaegel
Trinity County Supervisor
District 3

P.O. Box 669
Big Bar, CA 96010
September 24, 2009

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94211-2460

*RE: CalFire Proposed Fawn Lodge Forest Fire Station Replacement Project
Trinity County, California*

Dear Dan:

The State of California is making a big mistake in pursuing this project that will require the removal of two 1935 Civilian Conservation Corps (CCC) structures from their historic setting. These buildings are more valuable and unique than what is related in your report. I am asking that you preserve these buildings in their historic setting.

#5

In looking over the report I am not convinced that the State really needs to change the compound. Certainly, maintenance and upgrades are evidently in order, but the alternative I would ask you to select—to abort the present chosen alternative and keep the buildings as they are—would be much cheaper for the State than altering the whole flat and constructing costly new buildings, especially in light of California's present fiscal situation.

#6

As time goes by more of these CCC buildings are lost to us, leaving the remaining ones even more precious. I worked for the Forest Service when Mark V. Thornton conducted research and analysis of federal lookouts in Region 5 ("Fixed Point Fire Detection, The Lookouts," 1986) and I supplied him with some of the lookout information from the Big Bar District. I believe he also conducted a similar survey and report for Region 5 on our historic administrative buildings, but I don't remember the year. Thornton did a great job in helping heritage resource personnel evaluate such historic structures.

As stated in your CalFire report on Fawn Lodge, Mark in 1994 completed a study of your historic structures. You use his report as part of your evaluation/mitigation discussion with respect to the two CCC structures.

Mark's opinion is that the Paymaster's Office has "a high degree of historical architectural integrity" and is potentially eligible for listing on the National Register, and the Kitchen/Messhall, despite changes, "still retains some of its historical character." Mark's opinion should be weighed even more heavily in the State's decision of removal. More and more of these wonderful CCC-constructed buildings are being lost as time goes on, so it is even more crucial to preserve those that are left. Thornton's report for the State pointed out, in 1994, that there are "very few CCC offices left in the CDF [CalFire] inventory."

#7

Mitigation for the removal of the two buildings, according to your report, includes a prior commitment by the State in "preserving 29 of its significant historic buildings to compensate for the impact of having to demolish others which could not be saved." In the Fawn Lodge buildings, the first thing to point out is that they would not have to be put into this could be/could not be saved category if this project were aborted or altered and allow the buildings to remain. There is an option here. In these 29 buildings the State promises to

#8

preserve, I would venture to say there are very few CCC buildings, and, of these, the Fawn Lodge buildings are either the only examples, or part of only a few examples, of CCC-constructed buildings that were actually part of a CCC camp. In California, the large majority of CCC-constructed buildings were constructed in the National Forest in the form

#9

#10

of lookouts, Forest Service guard stations, and administrative buildings within the dozens of Forest Service district and forest compounds. Very few of these buildings remain that were actually part of the CCC camp itself. More value should be placed on these two rare buildings at Fawn Lodge than what is related in your report. They are a priceless, nonrenewable part of our history that cannot be adequately mitigated if removed.

10

Trinity County history is important to me, and I would guess than none of the 29 "committed" State buildings are within our county. The two Fawn Lodge buildings should also be preserved for the sake of Trinity County history.

11

According to your report, reasons for the buildings' removal include (1) they are old buildings with some maintenance needs, (2) there is a lack of security, (3) there presently is less than full compliance with present health and safety standards, (4) there is asbestos in some of the siding and tile flooring, and (5) the flood plain requires that the whole site be elevated with fill.

12

1. The buildings could be continued to be occupied on a repair and maintenance basis that would be much cheaper than building this whole new compound that also includes major landscaping and fill.

2. Certainly there must be reasonable ways to increase security that does not include the major upheaval of this flat.

13

3. There must also be ways to address the health and safety issues without the massive changes. Perhaps an extra restroom facility could be added that makes it easier for both sexes and which also allows handicapped access.

14

4. From what I understand, asbestos usually isn't a real problem in the siding and flooring unless you intend to tear the siding and flooring out. It should not be much of a problem as the buildings are now.

15

5. Regarding the flood issue, Fawn Lodge apparently survived the 1964 Christmas Week Storm without any problem. Geologists who looked at the "geological record" considered this as a flood that happens about every 1,000 years. If the buildings could stand that natural disaster in 1964, I would think they will continue for many more dozens of years without any real threat.

16

On whether or not the removal of the buildings would affect the "scenic vista" along Highway 299, I believe that it would. For many years my family and I drove from the Bay Area up to Denny. As a child, even though I didn't have much interest in buildings then, I considered these little structures to be very attractive in their setting and with the American and State flags flying out in front. At that time, in the 1950s, the highway went right past the compound. Our family treated Fawn Lodge as a landmark along the way and referred to it in respect to how far we had driven on our route. Later, now that the highway has been rerouted, I can still see these buildings from the highway, and I notice them every time I go past. To me—and I would bet also to many other people—Fawn Lodge with its historic buildings is still a local landmark.

17

Summary. With this letter, then, I am asking CalFire to select the "no action" alternative and continue using the station as it is, with repair and maintenance as necessary.

The removal of these two buildings would be a significant adverse effect to the cultural resources and would be a significant adverse effect to the scenic vista. Their loss would be a loss to Trinity County history.

18

The removal of the buildings, with the following extensive bulldozer work and the construction of new buildings would be a significant adverse effect to the California State budget, as well.

#19

I would also ask you to expand the timeframe to accepting public comments.

#20

Additional Comment. I and several others are very disturbed that CalFire chose this way to advertise this project. Posting the proposal at and near the location and then having the full report only available at a few State offices and on the CalFire webpage to us is not making much of an effort to inform the public. How many of us are in the habit of checking the CalFire webpage every couple of weeks? The U.S. Forest Service may get lambasted for many things over the years locally, but it makes an extra effort to keep the public apprised of planned projects. It keeps an active mailing list and also places announcements in the newspapers—besides also showing all this on its webpages. CalTrans, which is also a State entity, works under CEQA, too, and yet we are kept well informed about proposed highway projects.

#21

Rich Jenkins mentioned to me, and you also mentioned to me, that CalFire had made a real effort to find alternatives for the two buildings, including the prospect of moving them to another location. If the State was so active in identifying partners or interested parties to help in this effort, then why wasn't the Trinity County Historical Society contacted at some point months ago? You have to admit that 30 days does not give anyone much time in considering this situation.

#22

The Historical Society, like most nonprofits, holds its board meetings once a month. Certainly giving the society only one month to look into different alternatives for two unique historic CCC buildings is not reasonable at all. It is likely the society cannot find a quick solution to this problem, but it would have been conscientious of you to contact this group. (Rod Plew, President, 623-5211, P.O. Box 333, Weaverville, CA 96093)

#23

After reading your report and the explanation of the method of advertising the one-month-long window for comments, I realize that if Bob Maxey hadn't alerted the historical society about it, we would never have been made aware. There was no plan for CalFire to mail a notice, or to run an announcement in the *Trinity Journal*.

#24

If you and your staff were truly wishing for the preservation of these buildings, I would have thought you would have contacted a local group of people who have had a great deal of experience with Trinity County history and preservation of buildings and artifacts.

#25

Thank you for considering my letter.

Sincerely,

Gay Berrien
Gay Berrien

Dan,

On a different subject from Fawn Lodge, I wanted to mention a mistake on Page 11 of your report. There it is written, "Since the 1880s the lumber industry has been the most important source of employment in the area." This is not true. In the 1880s through to probably the 1930s or 1940s, the lumber industry consisted of various sawmills located in different areas to provide local needs. However, the sawmills and lumber did not provide a major source of employment during that time period. In the 1880s hydraulic placer and hardrock gold mining made up the primary industry, of course also using the sawmills for timbers and flume lumber and such. It wasn't until much later that the Forest Service began its commercial timber sales (probably 1940s and, downriver here, 1950s) when there were roads enough for accessing areas to be harvested and then transporting the logs, etc. Then, of course, the timber industry did become very important to us.

#26

Gay

Foster, Dan

From: . gay berrien [gberrien@wildblue.net]
Sent: Tuesday, October 06, 2009 7:42 PM
To: Foster, Dan
Cc: hots@snowcrest.net; plewinc@snowcrest.net
Subject: Fawn Lodge Mitigated Negative Declaration

TO:

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

RE: Fawn Lodge Mitigated Negative Declaration

Dear Mr. Foster:

As you may know, I'm on the board of the Trinity County Historical Society. I've been authorized to ask you, if possible, to add something to the letter that our president, Rod Plew, already sent to your office in reference to Fawn Lodge. (Rod is on vacation right now.) The Historical Society would additionally like to request that CalFire extend the public review period. We believe one month is not sufficient.

#27

Thank you for considering this.

Gay Berrien
Gay Berrien
Board Member
Trinity County Historical Society
P.O. Box 333
Weaverville, CA 96093

October 6, 2009

10/8/2009

Robert W. Maxey
2586 Sacramento Drive
Redding, CA 96001

September 29, 2009

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94211-2460

RE: CalFire Proposed Fawn Lodge Forest Fire Station Replacement Project
Trinity County, California

Dear Dan:

The new design for the station does not take into account the historical significance of the site. Fawn Lodge is part of the foundation of the California Department of Forestry and Fire Protection. We should remember that the CCC is a part of our foundation, where many of our CDF employees came from. It would be a shame to destroy the Paymaster's house, which is the "only 21' x 25' CCC era office in the CDF building collection" (Thornton 1994).

28

I just don't think that destroying Fawn Lodge Forest Fire Station, as we know it, is in the best interest of the taxpayer's dollars. The station needs a remodeling and much needed maintenance, which in the past has always been deferred. Understanding that the state is not a typical homeowner, repairing termite damage and dry rot is the normal course of action for maintaining structures.

29

The report states that it's necessary to raise the station site above the 100-year flood plain, however, on page 56 of the same report it is stated that there is no known 100-year flood hazard map for the area. The station has never had a flood problem near its building in my 27 year tenure with the Shasta Trinity Ranger Unit.

30

Currently, the kitchen at Fawn Lodge is large enough to handle a crew of 12 to 14. There is enough dining room square footage to handle another table for an additional 12+ diners. I have personally held luncheons for 40+ guests and the facility worked very well. Office staff came from Redding for lunch at Fawn Lodge and all were seated along with the crew for the occasion. The block / brick foundation under the kitchen was installed by Crystal Creek crews in the late 1960's. That job was supervised by Ranger One Jack Trapp, who still lives here in Redding.

31

In regards to the barracks, the only improvement needed would be a new building, in the foot print of the present one. This would answer the questions on how to incorporate separate male and female restrooms as well as handicap facilities.

With the amount of calls from Fawn Lodge Forest Fire Station I don't feel that a drive through garage is a necessity. In the 10 years that I was there, we never had a problem backing one of our engines into the garage. If the openings of the current three door garage are too small, then it could simply be remodeled to have two wider doors.

#32

The proposed plan shows the septic system on the eastern part of the property, which is a hillside. Even if they find room for the required leach field, it will require a pumping system to raise the effluent up to the new septic system. This sounds like an increase in maintenance cost to me.

#33

Landslides are addressed as "no impact", yet it is proposed to cut into the existing hillside with bulldozers. Any cut into a hillside in Trinity County without retaining walls will result in landslides in a wet winter. Decomposed granite has a habit of moving once disturbed.

#34

Replacing the old buildings at Fawn Lodge will not make an improvement in overall response time. To achieve this, the station would have to be relocated closer to Highway 299. Regardless of garage type, you must drive out of the yard, across the bridge and up to the highway before heading east or west to begin responding to a call.

#35

I disagree with the statement that there would be a "less than significant impact" on the existing visual character and quality of the site (page 33). In the long term, even if you disregard the historical value of the station itself, the loss of 25-30 conifers will take more than a significant amount of time to mitigate.

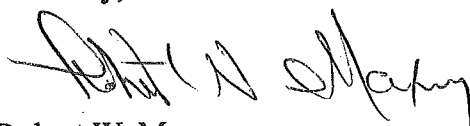
#36

No one from past crews or those familiar with Fawn Lodge can understand the need to change this historical station. It is evident that those responsible for wanting or proposing a new compound at Fawn Lodge have never stayed a day or two there and enjoyed the unique surroundings. Fawn Lodge has been experienced by many past and present administrators. The history of who has gone through Fawn Lodge runs from Unit Ranger Howard Bromwell to the present Battalion Chief of Weaverville-Fawn Lodge. If Fawn Lodge is destroyed and a new installation is built, another historical aspect of CDF history will be lost forever.

#37

Thank you for considering the opinion of someone that has lived and enjoyed working in the unique surroundings of Fawn Lodge Fire Station. Please keep me informed of any future developments regarding this proposed project.

Sincerely,



Robert W. Maxey
Retired Fire Captain, Fawn Lodge 1975-1985

From: Robert Maxey [mailto:capt_maxey@msn.com]
Sent: Tuesday, October 13, 2009 4:38 PM
To: Foster, Dan
Subject: RE: Fawn Lodge

Dear Dan,

How much consideration has been given to the relocation of Fawn Lodge F.F.S. Now would be the time for relocation, based on fire occurrence history of the response area. Then the state could dispose of the eighty plus acres at Fawn Lodge F.F.S. as excess property. The old Cal Trans Buckhorn maintenance site comes to mind. Instant access to Highway 299 without a long driveway, plus no fifty year flood problem or maintenance of a bridge, very little site prep and a large shop floor and foundation already there. Also a water system on site. The station would be in full view of the public, being next to the highway. A new site based on a response history would improve initial attack times, as the Department continually strives for improvement. As I remember most responses were towards Lewiston, with that in mind it would be logical to look for a site at the top of the hill on Lewiston Road.

38

All things considered, the most economical way would be to build a new barracks at Fawn Lodge and remodel the rest.

#39

Thanks for your time and consideration.....Robert Maxey



Trinity County Historical Society

P.O. Box 333, 780 Main Street
Weaverville, CA 96093-0333
Phone: 530.623.5211
FAX: 530.623.5033
Email: jake@trinitymuseum.org
Web Site: www.trinitymuseum.org

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
Resource Management Program – Environmental Protection
P.O. Box 944246
Sacramento, CA 94211-2460

Trinity County Historical Society Comments on CalFire Proposed Fawn Lodge Forest Fire Station Replacement Project, Trinity County, California

Dear Mr. Foster:

The Trinity County Historical Society has been reviewing your report on the State's proposal to rebuild on the Fawn Lodge Fire Station site, which will include the removal of two historic Civilian Conservation Corps (CCC) buildings. The Historical Society strongly urges you to preserve these buildings, rather than tear them down. The best alternative is to leave them at their original historic location and continue to use them.

#40

The two buildings are integral to Trinity County history regarding the 1933-1942 occupation here by the CCC in seven camps that existed within the county boundary. Six of these were on national forest and were managed through the Forest Service, or federal government. Fawn Lodge was the only one operated through the State. State-operated CCC camps were rare.

We are losing more CCC buildings as time goes on. It is important to preserve what we have. In Trinity County, we believe the only other structures left are one from Camp Mad River that stands on private property near Ruth and a second one from Camp Hawkins Bar that stands on private property at Hawkins Bar. The Fawn Lodge structures were part of a unique State operation and they are two of very few such CCC buildings surviving today.

Comments on reasons for project

- 1. The buildings are old, requiring upgrades and continued maintenance.*

The Historical Society has had some experience with old buildings and their upkeep. In reading your report we can empathize with some of the things happening to the two buildings, such as evidence of some termite damage, but we don't see anything that can't be corrected. Even some of the more expensive repairs or modifications to the buildings, we believe, would still not come close to the expense of the razing, excavation and bulldozing, and new building constructions that CalFire proposes here.

#41

2. *There is a lack of security in the Fawn Lodge compound.*

There is a variety of options in increasing security for a building or group of buildings. The Historical Society has used several of these options in taking care of the very sensitive and valuable artifacts inside the Jake Jackson Museum as well as the buildings outside in our historical park. We would not think that security would be a critical enough reason to replace the Fawn Lodge historic buildings.

#42

3. *There presently is less than full compliance with present health and safety standards.*

Our museum has some of these same issues with some lack of handicapped access to some of the exhibits. Some of these things would be good to fix, but are not mandatory. There are many ways you can bring these standards up without having to destroy the historic buildings.

#43

4. *There is asbestos in some of the siding and tile flooring.*

This is the situation in many buildings of this time period. There have been many CCC-era Forest Service buildings that have been removed and dismantled over the years. (Thus, the increased necessity for keeping the Fawn Lodge structures) There has been asbestos present in those buildings. We understand that there was no real problem with the continued occupancy of the buildings, so long as the siding and flooring was mostly left alone. When it came time to remove the buildings, however, proper hazardous material procedures had to be followed.

#44

5. *There is concern about flooding, requiring the elevation of the whole area with fill.*

Those of us who were living in Trinity County during the 1964 Flood (Christmas week) wonder how there may be a potential flooding problem at Fawn Lodge when it came through that massive, unprecedented rainstorm without being affected. The likelihood of another flood like that is very small. CalFire would do well to save the planned expenditures for something else.

#45

Mitigation

The Historical Society does not believe the discussed mitigation is sufficient for replacing the loss of the two Civilian Conservation Camp buildings at Fawn Lodge. The Paymaster Cabin was cited by Mark V. Thurston in his 1994 report as being potentially eligible for listing on the National Register. The Kitchen/Messhall had had some changes, but according to Thurston, despite the changes, "still retains some of its historical character." Now, fifteen years later and probably after more CCC buildings having been destroyed by the various agencies, Thurston's opinion should be considered even more strongly by CalFire in the planning for the Fawn Lodge site. Instead of devising ways to get rid of the buildings and replace them, effort should go into continuing their use and modifying and upgrading as necessary to keep them active and healthy.

#46

The report's explanation that CalFire has made a commitment to preserve 29 historic buildings, thus making the removal of the two Fawn Lodge buildings easier to bear, leaves some things to be desired. The 29 structures probably only include a few that were CCC-era, and of those fewer CCC-era "committed" buildings, there are probably even fewer—or none—that were actually part of a State-operated CCC camp. The Historical Society believes the Fawn Lodge buildings are much more important than what the report attempts to show. If anything, the two Fawn Lodge buildings should be made part of the "committed" list.

#47

Significant adverse effects

Cultural Resources. Contrary to the conclusions shown in the report, the Historical Society believes that if the project is allowed to go forward, there definitely will be a significant adverse effect to cultural resources, for the reasons already stated above.

#48

Scenic Vista. Residents of Trinity County, and people traveling through, see Fawn Lodge as a real landmark along the highway. People still notice it from where the highway was rerouted some years ago. The buildings are very aesthetic in their historic setting. We can guess that many of the engine crew personnel who occupy the flat during fire season also have some real pride and interest in the old buildings.

#49

Conclusion

The Trinity County Historical Society asks you to choose a "no action" alternative on this project proposal. Let some of CalFire's dollars go into the continued integrity and preservation of these two unique and irreplaceable buildings.

#50

Thank you.

Sincerely,



Rod Plew
President

09-20-09

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94211-2460

Subject: Removal of CCC Camp Buildings

I am writing to voice my opposition to the removal of these two historical valuable building. Little by little the CCC buildings are disappearing. You as a state agency have the responsibility to preserve these buildings. Before you do anything you should take an inventory of all the CCC buildings in California. This will give you an idea how much an impact the removal will have.

#51

As with any historical important building the two building should be remodeled on the interior. They could be brought up to date with all the modern requirements and facilities. . The remodel job could be a project for the local college building class. The only thing the state would pay for would be materials. This would reduce the cost to the state and be good public relations.

#52



Edward Holland
P.O. Box 1069
Eureka, CA 95502

707-444-3153

October 13, 2009
Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94211-2460

RE: CalFire Proposed Fawn Lodge Forest Fire Station Replacement Project
Trinity County, California

Dear Mr. Foster:

As an advocacy group for the history and heritage of the Civilian Conservation Corps, I have been contacted by one of our members, Gay Berrien., about the proposed work at Fawn Lodge. Civilian Conservation Corps Legacy, Inc. works with people across the nation on the task of remembering the heritage of the CCC and its vast legacy to our country. Although I have not personally seen the buildings in question, I would ask that you use every possible consideration in their preservation.

#53

Last year the CCC celebrated the 75th anniversary of its establishment. In those 75 years, this early slice of conservation heritage has disappeared quickly. As a nation we are presently struggling with the notion of how we should conduct ourselves as we are confronted with modern natural resource issues. Drawing of the lessons of the past plays an important part of development for the future.

The preservation of the few remaining CCC built camp buildings is very important to sharing the story of the CCC and enabling our citizens to have a first hand view of what it was like to live in a CCC Camp. After WWII, most camps were disposed of and buildings were sold, recycled, and otherwise destroyed. The very few remaining buildings stand as a symbol. Most CCC camp foundations are now hidden among 65 years of brush and trees. Their purpose and contribution has become unknown to our citizens and even avid CCC advocates are unable to identify their location after intensive research. CCC history in America has reached a point where all signs of its existence are very important. In California knowing a location of a camp and actually having a CCC building is very special.

#54

As you go forward with your decision making process, do not forget that when these buildings are gone so will be the landmarks that remind the California Department of Forestry and Fire Protection of its early agency heritage and California citizens that they once played a part in the greatest conservation effort ever recorded in America.

Sincerely,
Joan Sharpe, President
P.O. Box 341
Edinburg, VA 22824
www.ccclegacy.org
ccc@ccclegacy.org

From:ccc@ccclegacy.org [mailto:ccc@ccclegacy.org]

Sent:Tuesday, October 13, 2009 1:27 PM

To:Foster, Dan

Subject:Support for CCC heritage

Mr. Foster,

I am presently on travel and am submitting my comments on Fawn Lodge prior to today's deadline. I am sorry that this is not on official letterhead nor does it contain my signature as president of national CCC Legacy, Inc. I extend my apologies and will be able to send an official letter once I get back to the office next week if you should desire.

#55

Joan Sharpe, President

From: ccc@ccclegacy.org

Sent: Tuesday, October 13, 2009 5:26 PM

To: Foster, Dan

Subject: RE: Support for CCC heritage

Mr. Foster,

Thanks for the acknowledgement. As someone who often interfaces with tax-payer based organizations for the purpose of bringing attention to historical preservation, I am certainly sensitive to the problems associated with trying to meet the needs of the future. Thanks for your service to the State of California.

#56

Joan Sharpe